

REMARKS

Amendments

Revisions to the Specification

The Examiner objected to Figure 6 because reference numbers 740 and 750 were not mentioned in the specification. Applicant has amended the specification to refer to reference numbers 740 and 750. Elements 740 and 750 correspond to elements 640 and 650, respectively, in Figure 5 and language similar to that used to describe elements 640 and 650 in the specification has been added to describe elements 740 and 750. No new matter has been added.

Amendments to the Claims

Applicant has amended the claims to more particularly point out what Applicant regards as the invention. In particular, Applicant claims a description specifier consisting of a list identifier and an object identifier, and a delete descriptor command that also updates data in corresponding parent structures when a child list description is deleted. No new matter has been added as a result of these amendments.

Objections

Objections to the Drawings

The Examiner objected to the drawings because of a misspelling in Figure 4 and because Figure 6 included reference numbers not mentioned in the specification. Applicant is submitting a replacement sheet for Figure 4 that corrects the misspelling. Applicant has revised the specification to include a description of elements 740 and 750 as set forth above. Accordingly, Applicant respectfully requests the withdrawal of the objection to the drawings.

Objection to the Claims

The Examiner objected to claim 20 as containing informalities. Applicant respectfully submits that claim 20, as amended, corrects the informalities and respectfully requests the withdrawal of the objection.

Rejections

Rejections under 35 U.S.C. § 112, second paragraph

Claims 12

Claim 12 stands rejected under 35 U.S.C. § 112, second paragraph for improper antecedent basis. Applicant respectfully submits that claim 12, as amended, satisfies the requirements of 35 U.S.C. § 112, second paragraph and respectfully requests the withdrawal of the rejection of the claim under § 112.

Rejections under 35 U.S.C. § 102(b)

Claims 11, 15-22, 24-30 and 32-43

Claims 11, 15-22, 24-30 and 32-43 stand rejected under 35 U.S.C. § 102(b) as being anticipated by TA Document 1999025: *AV/C General - Descriptor and Info Block Mechanism* published by the 1394 Trade Association. Claim 11 has been cancelled. Applicant respectfully submits that TA Document 1999025 does not disclose each and every element of the invention as claimed in claims 15-22, 24-30 and 32-43.

TA Document 1999025 discloses an audio video command (AV/C) protocol used to control AV devices on a IEEE 1394 ("Firewire") bus. A 1394 AV controller uses the commands to access and manipulate information about the devices that are stored within each device as a hierarchy of descriptors. A descriptor is addressed using a "descriptor specifier." TA Document 1999025 discloses nine types of descriptor specifiers [§ 8.2, pages 51-59]. The descriptor specifiers identify a descriptor through various types of identifiers: 1) a root_list_ID, 2) a child_list_ID, 3) a list_type, 4) a list_ID, 5) a combination of root_list_ID, list_type, and object_ID, or 6) an entry_type (*see* Table 8.2 on page 52).

In contrast, each of Applicant's independent claims 15, 21 and 26 claims a descriptor specifier that consists of a list identifier and an object identifier. TA Document 1999025 does not teach or suggest a description specifier with this particular combination of identifiers. The Examiner pointed to page 85 as disclosing a description specifier consisting of a list identifier and an object identifier. Applicant assumes the Examiner is referring to the highlighted portion of page 85 because that is the only place on page 85 "object_ID" is mentioned.. However, the highlighted portion states that a list descriptor may be accessed using a list_ID **OR** an object_ID but does not teach or suggest using the

combination of a list_ID and an object_ID as a description specifier to access a list descriptor. Therefore, TA Document 1999025 does not teach each and every limitation of Applicant's invention as claimed in claims 15-22 and 24-30.

With regard to claims 32-43, TA Document 1999025 also discloses a WRITE DESCRIPTOR command that can delete list and entry descriptors by specifying a delete subfunction value. The WRITE DESCRIPTOR command can also be used to separately update data related to the deleted descriptors by specifying an update subfunction value. Thus, the delete subfunction for WRITE DESCRIPTION command disclosed in TA Document 1999025 does not also update data in corresponding structures when a child list description is deleted. A separate WRITE DESCRIPTION command specifying a change subfunction must be issued to perform the update of the related data when using the 1394 AV/C commands. Therefore, TA Document 1999025 does not teach each and every limitation of Applicant's invention as claimed in claims 32-43.

Accordingly, Applicant respectfully submits that the invention claimed in claims 15-22, 24-30 and 32-43 is not anticipated by reference under 35 U.S.C. § 102(b) and respectfully requests the withdrawal of the rejection of the claims.

Rejections under 35 U.S.C. § 103

Claims 1-6, 8-10, 13, 14 and 44

Claims 1-6, 8-10, 13, 14 and 44 stand rejected under 35 U.S.C. § 103(a) as being obvious over TA Document 1999025 in view of U.S. Patent 5,101,494 to Bilski et al. Applicant respectfully submits that the combination is improperly motivated and furthermore does not teach each and every element of the invention as claimed in claims 1-6, 8-10, 13, 14 and 44.

Bilski discloses a structure file that contains descriptors of system control structures for a computer operating system. The structure file is used to interpret system memory images, such as a dump. Figure 21 illustrates an exemplary computer system in which the structure file may be used. In Figure 21, a common bus 200 connects a central processing unit 206, a memory 202 and a disk unit 224 that holds the structure file.

With regard to claims 1-6, 8-10, 13, and 14, independent claims 1 and 8 claim a descriptor specifier that consists of a list identifier and an object identifier. TA Document 1999025 does not teach or suggest a description specifier with this particular combination

of identifiers. Therefore, Bilski must disclose such a descriptor specifier to establish a proper *prima facie* case of obviousness for claims 1-6, 8-10, 13, and 14. However, Bilski does not disclose descriptor specifiers consisting of a list identifier and an object identifier as claimed by Applicant. Therefore, Bilski cannot fill the gap in TA Document 1999025.

The Examiner has not particularized his rejection of claim 44, which claims the deletion of a child list descriptor and the updating of various fields using a single delete description command. Applicant respectfully submits that neither TA Document 1999025 nor Bilski, nor the combination, teach these claimed elements. If the Examiner maintains the current rejection of claim 44, Applicant respectfully requests that the Examiner specify the portions of the references on which he is relying in the next Office Action.

Furthermore, Applicant respectfully submits that the combination of TA Document 1999025 and Bilski is improperly motivated. The Examiner has equated Applicant's claimed serial bus with Bilski's common bus 200. The Examiner has also equated Applicant's claimed data structure with Bilski's structure file. The Examiner stated that one of skill in the art would be motivated to incorporate the TA Document 1999025 command set into Bilski to access data between the devices. Applicant respectfully but strongly disagrees with the Examiner because neither TA Document 1999025, nor Bilski, nor the art as a whole supports the Examiner's stated motivation. TA Document 1999025 describes the audio video command protocol for controlling audio video devices on a 1394 serial bus. Bilski discloses a common bus 200 that the Examiner is apparently interpreting as a serial bus so that the 1394 AV/C serial bus protocol can be used on the common bus 200. However, as well known in the art of computer system architectures, a parallel bus, such as a backplane bus, is used to connect memory to a CPU and thus common bus 200 must be interpreted as a parallel bus. Additionally, because bus 200 is a common bus, the same bus protocol is used to communicate between all devices on the bus 200. No one of skill in the art would consider using any serial bus protocol, much less the 1394 AV/C serial bus protocol that is specific to controlling audio video devices, to access data in memory 202 by CPU 206 on a parallel bus, such as common bus 200. Therefore, the Examiner's stated motivation

for the combination is unsupported and the combination is improper. If the Examiner maintains the combination is proper, Applicant respectfully requests he provide a references in the next Office Action that disclose the use of a serial bus for memory-CPU communications and/or the use of the 1394 AV/C serial protocol for memory-CPU communications.

Therefore, the combination of TA Document 1999025 and Bilski cannot render obvious Applicant's invention as claimed in claims 1-6, 8-10, 13, 14 and 44, and Applicant respectfully requests the withdrawal of the rejection of the claims under 35 U.S.C. § 103(a) over the combination.

Allowable Subject Matter

Applicant thanks the Examiner for indicating that claims 7, 12, 23 and 31 contain allowable subject matter if rewritten to include all the limitations of the claims from which they each originally depended. Claim 12 has been so amended. In view of these amendments, Applicant respectfully submits that claim 12 is now in condition for allowance, and request allowance of the claim. Applicant has not amended claims 7, 23 and 31 at this time because Applicant believes they are allowable as they currently stand.

SUMMARY

Claims 1-10 and 12-44 are currently pending. In view of the foregoing amendments and remarks, Applicant respectfully submits that the pending claims are in condition for allowance. Applicant respectfully requests reconsideration of the application and allowance of the pending claims.

If the Examiner determines the prompt allowance of these claims could be facilitated by a telephone conference, the Examiner is invited to contact Sue Holloway at (408) 720-3476.

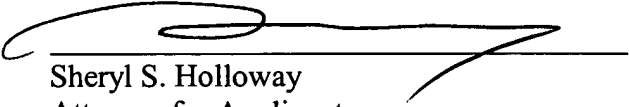
Dep sit Account Authorization

Authorization is hereby given to charge our Deposit Account No. 02-2666 for any charges that may be due. Furthermore, if an extension is required, then Applicant hereby requests such extension.

Respectfully submitted,

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